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Attorneys for CELTIC BANK CORPORATION

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

In re:	)	
	)	
TROPHY HOSPITALITY, LLC,	)	Case No.: 21-40512-11
	)	
Debtor.	)	Chapter 11
	)	

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**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF CELTIC BANK  
CORPORATION'S OBJECTION TO CONFIRMATION OF CHAPTER 11 SMALL  
BUSINESS SUBCHAPTER V PLAN**

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CELTIC BANK CORPORATION, in support of its Objection to Confirmation of Chapter 11 Small Business Subchapter V Plan and pursuant to Rule 201 of the Federal Rules of Evidence, respectfully requests that this Court take judicial notice of and consider the existence of the documents on file with this Court as follows:

1. A true and correct copy of Celtic Bank's proof of claim filed as fully secured in the amount of \$1,794,983.54 [Claim number 3] is attached hereto as Exhibit 1.
2. A true and correct copy of the Debtor's Plan of Reorganization, including projections in support of its Plan [Dkt. No. 43] is attached hereto as Exhibit 2.

3. A true and correct copy of Debtor's filings with this Court on April 28, 2021 showing a book value of Celtic Bank's collateral of \$2,072,814.31 [Dkt. No. 23, p. 2], is attached hereto as Exhibit 3.

4. A true and correct copy of Celtic Bank's 1111(b)(2) election. [Dkt. No. 60] is attached hereto as Exhibit 4.

This Court is authorized to take judicial notice of the foregoing by Federal Rule of Evidence 201 (d); *see also*, *Lyon v. Gila River Indian Community*, 626 F 3rd 1059 (9th Cir. 2010).)

Dated: August 17, 2021

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Megan M. Adeyemo  
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Counsel for Celtic Bank Corporation

### **CERTIFICATE OF SERVICE**

The undersigned certifies that on August 17, 2021, a true and correct copy of the foregoing document was electronically filed and served via CM/ECF on all parties that have entered an appearance and requested service in the above-referenced case.

/s/ Anita Soto  
For Gordon Rees Scully Mansukhani LLP